

Exhibit 2

AFFIDAVIT and DECLARATION OF RANDALL REITZ

Randall Reitz declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a resident of Lafayette Hills, Pennsylvania, in Montgomery County.
2. I voted in the 2016 general election in my district, Whitemarsh West #2. I am registered as "Independent."
3. I am a software developer, though I am currently unemployed and looking for work.
4. I was one of the petitioners who petitioned to contest the results of the 2016 election in Pennsylvania. On December 2, 2016, I was informed by the court that we petitioners would have to post a \$1 million bond. I am a person of ordinary financial means, and I cannot take the risk of being responsible for such an enormous bond. Therefore, I was forced to withdraw my petition to contest the election.
5. I submit this affidavit/declaration to explain my experience in trying to seek a recount of the vote and an audit of the electronic voting machines used in my precinct and county.
6. After the election, I read an article by J. Alex Halderman, a computer expert, which discussed the vulnerabilities of electronic voting machines like those used in Pennsylvania. As a software developer who worked for a company with a publicly-facing website, I am well aware of the sophisticated attacks and hacking attempts that target companies and others in the United States, and how often our cyber defenses are not strong enough to counter these attacks.
7. Given these concerns about the security of the voting systems, I was eager to join the efforts to seek a recount of the vote and a forensic analysis of the electronic voting machines

in Pennsylvania. When I learned about the effort to gather petitioners to seek this recount and forensic analysis, I decided to join their efforts and submit a petition. My girlfriend, Catherine Cox, who lives with me and voted in this election as well, also submitted a petition.

8. Originally, I believed that the law required a county to recount the vote if three voters from the county filed petitions asking them to do so. I then learned that three voters from each *precinct* or voting district were required to submit petitions. I do not understand how ordinary voters can be expected to assemble that many petitions in order to launch a county-wide recount, let alone a state-wide recount.

9. Cathy and I submitted our petitions to Ben Jerner, a local organizer who was collecting petitions to submit to the Montgomery County Board of Elections on Monday, November 28, 2016.

10. I later learned that the Board of Elections refused to accept our petitions, and that they were filed in court instead.

11. On Friday, December 2, Cathy received a letter from the prothonotary of the Montgomery County Court of Common Pleas. The letter was dated November 29, 2016, and notified Cathy that a recount would begin on November 30. At the bottom of the letter, attached as Exhibit A, there was a note stating: "This document was docketed and sent on 11/30/2016." The postmark on the envelope was also November 30, 2016.

12. I never received a letter from the prothonotary or notice of any kind relating to a recount.

13. I did not know that the recount did not begin on November 30, and that, instead, there was a hearing in court to determine whether a recount should be conducted at all. I never received notice of that hearing.

14. I did not learn until after the hearing that the judge denied the petitions and the request for a recount, and that no recount of any precinct in Montgomery County is currently scheduled to take place.

15. Because the electronic machines in my district had no voter-verified paper trail, I believe it is crucial to have a full forensic analysis of the electronic voting system to ensure that the vote tally was accurate and reliable.

16. I have been shocked by the difficulty in seeking a recount of the vote in Pennsylvania. I do not understand how voters on their own could be expected to gather enough petitions in a county to trigger a recount, let alone a state-wide recount. Nor do I understand how voters on their own could be expected to pay for the legal costs associated with seeking these recounts.

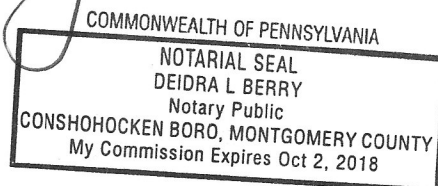
17. I believe a recount is absolutely necessary to instill trust in the vote and ensure the integrity of our voting system.

Dated: December 3, 2016
Lafayette Hill, Pennsylvania


RANDALL REITZ

Sworn to and subscribed before me
this 3 day of Dec, 2016.


NOTARY PUBLIC



IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW

DOROTHY L. ANROM, et al

VS.

No. 16-28357

MONTGOMERY COUNTY
BOARD OF ELECTIONS

ORDER

AND NOW, this 29th day of November, 2016 the
Petition to Recount and/or Recanvass is scheduled for a **HEARING** before the **Honorable
Bernard A. Moore** on **Wednesday, November 30, 2016 at 1:30 p.m.** in Courtroom C of
the Montgomery County Courthouse, Norristown, Pennsylvania.



2016-28357-0001 11 29 2016 3:38 PM # 11061405
Order

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Mark Levy - MontCo Prothonotary

Michael R. Kels

Court Administrator

**THE FILING PARTIES RESPONSIBLE
TO NOTIFY YOUR OPPONENT(S)
OF THE ABOVE HEARING DATE.**

*Copies Sent to Doug Lieb, Esq. via e-mail on Tuesday, November 29, 2016.
Copies Sent to Nicole Forzato, Esq. via e-mail on Tuesday, November 29, 2016.*